

EXHIBIT 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN BROADCASTING
COMPANIES, INC., DISNEY
ENTERPRISES, INC., TWENTIETH
CENTURY FOX FILM CORPORATION,
CBS BROADCASTING INC., CBS STUDIOS
INC., FOX TELEVISION STATIONS, LLC,
FOX BROADCASTING COMPANY, LLC,
NBCUNIVERSAL MEDIA, LLC,
UNIVERSAL TELEVISION LLC, and OPEN
4 BUSINESS PRODUCTIONS, LLC,

Plaintiffs,

v.

DAVID R. GOODFRIEND and SPORTS
FANS COALITION NY, INC.,

Defendants.

No. 19-cv-7136-LLS

[PROPOSED] PERMANENT INJUNCTION

Pursuant to the December 17, 2019 Agreement between Plaintiffs American Broadcasting Companies, Inc., Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, CBS Broadcasting Inc., CBS Studios Inc., Fox Television Stations LLC, Fox Broadcasting Company LLC, NBCUniversal Media, LLC, Universal Television LLC, and Open 4 Business Productions, LLC (collectively, “Plaintiffs”) and Defendants David R. Goodfriend and Sports Fans Coalition NY, Inc. (“SFCNY”) (collectively, “Defendants”) (ECF No. 243-2); the Court’s August 31, 2021 Opinion and Order granting Plaintiffs’ motion for partial summary judgment (ECF No. 322); and for good cause shown, particularly in the accompanying Motion to Enforce the Parties’ Case Narrowing Agreement and for Entry of Permanent Injunction, the Court hereby enters the following Permanent Injunction:

1. For the purposes of this Permanent Injunction, the following definitions shall apply:
 - a. The “Litigation” means the entire civil action No. 19-cv-7136 in the Southern District of New York.
 - b. The “Locast service” means the service operated by SFCNY that provides access to local broadcast signals over the internet to consumers, that is the subject of the Litigation.
2. Defendants, along with their officers, agents, servants, employees, attorneys, and other persons who are in active concert or participation with Defendants or their officers, agents, servants, employees, or attorneys (if they receive actual notice pursuant to Rule 65(d)(2) of the Federal Rules of Civil Procedure) are **PERMANENTLY RESTRAINED AND ENJOINED** from operating Locast.
3. Violation of this Permanent Injunction shall be subject to all applicable penalties, including contempt of Court.
4. This Court shall retain continuing jurisdiction over the Parties and the action for purposes of enforcing this Permanent Injunction.

SO ORDERED, this ____ day of _____, 2021.

Louis L. Stanton, United States District Judge